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White Plains, NY  
Atlantic City, NJ

March 31, 2025


Application GRANTED. Plaintiff shall respond to the motion to dismiss by **May 2, 2025**.

**Via ECF**

The Honorable Jennifer H. Rearden  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1010  
New York, NY 10007

The Clerk of Court is directed to terminate ECF No. 33.

**SO ORDERED.**

  
Jennifer H. Rearden, U.S.D.J.  
Dated: April 1, 2025

Re: Geoffrey Lewis v. El Ad US Holding, Inc., et al., Case No. 1:24-cv-9129 (JHR)

Dear Judge Rearden:

Our firm represents plaintiff Geoffrey Lewis (“Plaintiff”) in the above-captioned action. Pursuant to Rule 2(E) of Your Honor’s Individual Rules and Practices, we submit this letter motion requesting a three-week extension of Plaintiff’s time to respond to the Moving Defendants’ motion to dismiss, from April 11, 2025, to May 2, 2025.<sup>1</sup>

The basis for the requested extension is that, following the Moving Defendants’ filing of the motion to dismiss on February 14, 2025, the undersigned has unexpectedly been required to prepare for and participate in ten depositions in another case during the month of March. As such, additional time is needed to allow for adequate preparation and presentation of arguments in response to the numerous grounds presented by the Moving Defendants’ dispositive motion.

This is Plaintiff’s first request for an extension of time to respond to the motion to dismiss. We note that Plaintiff consented to a 50-day extension of time for Moving Defendants to file their motion to dismiss, which the Court granted. *See* ECF No. 24. Notwithstanding Plaintiff’s prior consent to Moving Defendants’ request, Moving Defendants’ counsel has informed the undersigned that the Moving Defendants oppose Plaintiff’s request for a three-week extension, but would agree to a 10-day extension.<sup>2</sup> We respectfully submit, however, that the full three-week extension is needed in light of the undersigned’s need to focus on the aforementioned depositions during the past six weeks.

Should the Court grant Plaintiff’s request, Plaintiff does not object to a corresponding extension of Moving Defendants’ time to file a reply brief. No appearances with the Court have been scheduled, and the instant request would not affect any other deadlines.

We thank the Court for its consideration of this request.

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<sup>1</sup> The “Moving Defendants” refers to the defendants which filed a motion to dismiss. *See* ECF No. 31. Plaintiff is in the process of serving the two additional defendants in this case, Eyal Rabinovitz and EDR Capital, both of whom are located outside of the United States.

<sup>2</sup> Moving Defendants’ counsel has requested that the parties’ email correspondence concerning the extension request be attached to this letter. Accordingly, such correspondence is attached as Exhibit A.

Hon. Jennifer H. Rearden  
March 31, 2025  
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Respectfully submitted,

YANKWITT LLP  
*Counsel for Plaintiff*

By: /s/ Jonathan Ohring  
Jonathan Ohring

cc: All counsel of record